

REMARKS

This is in response to the Final Office Action mailed April 4, 2007 in which pending claims 1-19 are rejected under 35 U.S.C. § 102(e) as being anticipated by Charles J. Lewis ("Charles") U.S. 2004/0162772. As discussed below, the Office Action fails to set forth a *prima facie* case that claims 1-19 are anticipated by Charles and accordingly, the rejection should be withdrawn.

A claim is anticipated only if each and every element as set forth in the claim is described either expressly or inherently in a single prior art reference. The Office Action fails to establish that each and every claim element is expressly or inherently taught by Charles.

*I. The Examiner's Rejection merely recites the claim language without explanation of the pertinence of the reference to each of the recited claim elements.*

Paragraph 5 of the Office Action states that claim 1 is rejected on the basis that Charles discloses a system for retrieving financial information from a financial data storage system, comprising: an application interface configured to return requested detail information to an application program by invoking a generalized interface to access detail interface information in a data mart that stores the detail interface information for a plurality of detail interfaces, and to instantiate and invoke a detail interface based on the detail interface information to obtain the requested detail information. The rejection merely recites the claim language and refers Applicant to FIG. 4 and paragraphs 0031-0032 of Charles.

Under 37 C.F.R. §1.104 the pertinence of each reference, if not apparent, must be clearly explained. The Examiner rejected claim 1 based upon FIG. 4 and paragraphs 0031-0032 without explanation of the pertinence of the FIG. 4 and paragraphs 0031-0032 of Charles to each of the recited claim elements and thus the Office Action fails to set forth a *prima facie* basis to reject claim 1. If the Examiner is relying on inherency, the Examiner must provide rationale or evidence tending to show inherency. MPEP § 2112.

*II. The Examiner's rejection does not establish that Charles teaches each of the recited claim elements.*

As discussed above, claim 1 was rejected based upon paragraphs [0031]-[0032] and FIG. 4 of Charles. Paragraphs [0031] and [0032] of Charles provide as follows.

[0031] It is yet another object of the present invention to provide a library of business objects that provide easy access to the database according to business subjects such as "Account," "Customer", "Position", "Stock", "Bond", "Derivative", "Counterparty", "Transaction", and the like, regardless of how the collection of data and information that pertains to each business subject may be physically arranged and structured on the database (including the core database, as well as the time series index, search index, reporting images, and the like.)

[0032] It is yet another object of the present invention to provide a computer platform that permits access through a unified, Internet-enabled, lightweight, scalable, user interface that supports browser-based inquiries, updates, and reporting and requires minimal code to be installed and maintained on each user's personal computer or other personal access device.

Paragraph [0031] discloses a database as shown in FIG. 4 including for example a time series index or search index and paragraph [0032] discloses a user interface that supports browser-based inquiries. The Office Action provides no explanation or rationale to support the conclusion that the database, user interface or other disclosure of paragraphs [0031] and [0032] teach an application interface configured to return requested detail information by invoking a generalized interface to access detail interface information in a data mart as recited in claim 1.

Further, claim 1 additionally recites to instantiate and invoke a detail interface based on the detail interface information to obtain the requested detail information. The Office Action contains no explanation or rationale to support that this claim element is taught by the Charles reference.

*III. The rejection of claim 1 on page 2 of the Action dated April 4, 2007 completely ignores the claim limitation to instantiate and invoke a detail interface based on the detail interface information to obtain the requested detail information.*

Not only does the rejection fail to establish that each of the recited claim elements is taught by the Charles reference, the Examiner's rationale for rejection on page 2 of the Action dated April 4, 2007 completely ignores the claim limitations to instantiate and invoke a detail interface based on the detail interface information to obtain the requested detail information.

Page 2 of the Office Action states:

"In response to Applicant's argument, the Examiner respectfully disagrees and submits that Charles discloses a generalized interface being used to access the detailed information. This use of the interface is disclosed in paragraphs 0036, 0076. Furthermore, paragraphs 0130 and 0137 teach the user interface formatting and the wide variety [sic] functions performed by it." Claims 1-19 recite the same subject matter and for the same reasons as cited above the rejection is maintained.

As discussed above, each of the recited claim limitations must be expressly or inherently taught by the reference to rejection a claim. Since the basis for rejection fails to consider each of the recited claim limitations including to instantiate and invoke a detail interface based on the detail interface information to obtain the requested detail information, the Office Action fails to establish a *prima facie* basis to reject claim 1. Claims 2-9 are dependent upon claim 1 and are allowable *inter alia*, based upon the allowability of claim 1.

*IV. The rejection of claim 10 fails to establish that Charles expressly or inherently teaches each of the recited claim elements.*

Claim 10 was also rejected as being anticipated by Charles. Similarly, the rejection of claim 10 merely recites the claim language and includes a general reference to paragraphs of Charles without any explanation of the pertinence of the cited paragraphs to the claim language. In particular, claim 10 recites a method of displaying financial data stored in one of a plurality of financial data storage systems, comprising receiving a detail information request from an application and invoking a generalized interface to a data mart and retrieving detail interface information from the data mart. Claim 10 was rejected on that basis that Charles discloses a method of displaying financial data stored in one of a plurality of financial data storage systems,

comprising: receiving a detail information request from an application and invoking a generalized interface to a data mart and retrieving detail interface information from the data mart (paragraphs 0153-0155).

Paragraphs 0153-0155 recite:

[0153] The Web server operates on either an NT or UNIX computer, and operates in conjunction with the Search Engine, 170 FIG. 4, Times Series Engine, 180, Reporting Engine, 190, and Distribution Server, 195, to enable on-line use of the features and functions residing in these components, and on-line viewing of the data and information that is published or otherwise produced by these components. As a result, via the UI the user can enter the following types of retrieval requests, in addition to those described above:

[0154] Invoke the Search Engine, 170, against the database. This engine enables the user to enter and conduct free-form searches, such as are common on Internet sites such as Yahoo and HotBot, against the contents of the present invention's database. An example would be a search for all "New York municipal bonds that pay more than 3% interest and mature in less than three years." The search engine that is deployed by and integrated into the invention is supplied by a third party software company.

[0155] Invoke the Time Series Engine, 180, against the database. This engine enables the user to enter historical queries and reports as of a specific data and time or across a historical period. An example would be a query requesting the consolidation of settled and pending positions, balances, and transactions from multiple accounts for the same customer, counterparty, or trader as of December 31 of the previous three years. The time series engine deployed by and integrated into the invention is supplied by a third party software company.

Paragraphs [0153]-[0155] as quoted above disclose a search engine, a database and a UI. Paragraphs [0153]-[0155] do not expressly or inherently disclose the recited claim element of receiving a detail information request from an application and invoking a generalized interface to a data mart and retrieving detail interface information from the data mart.

Claim 10 recites instantiating a detail interface identified by the detail interface

information, which was rejected on the basis that FIG. 4 and paragraphs 0031-0032 disclose instantiating a detail interface identified by the detail interface information. Paragraphs 0031-0032 disclose as follows.

[0031] It is yet another object of the present invention to provide a library of business objects that provide easy access to the database according to business subjects such as "Account," "Customer", "Position", "Stock", "Bond", "Derivative", "Counterparty", "Transaction", and the like, regardless of how the collection of data and information that pertains to each business subject may be physically arranged and structured on the database (including the core database, as well as the time series index, search index, reporting images, and the like.)

[0032] It is yet another object of the present invention to provide a computer platform that permits access through a unified, Internet-enabled, lightweight, scalable, user interface that supports browser-based inquiries, updates, and reporting and requires minimal code to be installed and maintained on each user's personal computer or other personal access device.

Paragraphs [0031]-[0032] reference a database, a search index, and a user interface that supports browser based inquiries, but do not teach, instantiating a detail interface identified by the detail interface information as recited in claim 10.

Claim 10 recites retrieving the detail information requested from one of the plurality of financial data storage systems through the instantiated detail interface which was rejected on the basis that paragraphs 0038-0040 of Charles disclose retrieving the detail information requested from one of the plurality of financial data storage systems through the instantiated detail interface. Paragraphs 0038-0040 recite as follows:

[0038] These and other objects of the invention are realized in the form of an improved integrated financial data reporting system that provides for real time data entry, data assessment, and report generation. An alert notification server alerts users when a financial threshold specifying a credit limit and/or a trading limit has been crossed. A data distribution server electronically distributes data to users on a recurring and/or periodic basis, and a search engine server provides free-form searches against

information stored in a consolidated database. The system also includes message formatting, database management, and select applications for preparing sophisticated financial presentations in essentially real time. Through this inventive system, financial institutions can rationalize risk, analyze performance, and determine compliance positions in a cost-effective manner.

[0039] Pursuant to a further embodiment of the invention, an integrated set of object-oriented (e.g., C++, Java, and the like) software components are configured as a distributed processing network. This processing network receives input records that contain the data elements which comprise or describe financial transactions (settled and pending), financial instruments, customers, counterparties, employees, organizational units, and financial institutions. The network derives information from such data elements by coordinating data aggregation, calculation, and consolidation. The network interrelates the data and information when storing it in a database that is designed for organizing, storing, and retrieving such data and information, and proactively distributes the data and information according to pre-defined instructions (e.g., alert users that a transaction has caused a negative cash balance to occur that is below a pre-defined minimum amount, and alert users again if the cash shortage has not been covered within a pre-defined time). The database structure and update functions are such that the incoming data are processed and combined with the previously stored data and information to form a continuous, real-time integration of critical customer, market, and firm information. The database may be accessed simultaneously by numerous different financial firm employees, customers, counterparties, and analytical software applications via a variety of network connections (e.g., Internet, intranet, LAN, WAN, private network, and the like). Trade and settlement transactions are processed providing consolidated current and projected balances and positions across customers, accounts, books, funds, traders, investment managers, counterparties, settlement and business locations, legal entities, and the like.

[0040] The invention includes a plurality of servers, each of which is called upon to perform functionality relevant to a particular input message, inquiry or report request, alert situation, or other subset of financial data processing. As shown in FIG. 4, these servers include: an Interface Transformation Server that maps and

reformats incoming messages into a system-compliant format; a Message Bus component which transports the message to a Controller component that distributes workload (input messages) to the appropriate information server; an Accounting Information Server for processing messages that contain transactions and deriving positions, lots, and balances on a trade date and settlement date accrual accounting basis; a Market Data Information Server that processes messages that contain data records from multiple disparate market data sources and derives a composite of each financial instrument (of virtually any type); a Customer/Counterparty Information Server that processes messages that contain data records from multiple disparate sources that describe, and record standing processing instructions for, customers and counterparties and derives a composite of each customer, counterparty, and financial institution; a Calculation Server that performs financial calculations such as valuations, gain/loss, and the like; an Alert Notification Server that alerts users when a financial threshold, such as a credit or trading limit, has been crossed; a Data Distribution Server that proactively and electronically publishes data and information to users and other programs; a Web Server that manages database updates and retrievals from/to browser-based or other "thin client" access devices; a Search Engine that enables expedient free-form searches against the data and information in the database; a Reporting Engine that produces reports in volume and electronically routes the reports to the appropriate recipients; and a Time Series Engine that enables expedient date-and-time searches against the data and information in the database. Multiple instances of any server can be added dynamically to increase processing throughput.

The pertinence of paragraphs [0038]-[0040] above to the recited claim limitation is not apparent other than the general reference to a financial data reporting system.

Claim 10 recites returning the detail information to the application which was rejected based upon paragraphs 0151-0152 of Charles. Paragraphs [0151]-[0152] provide as follows.

[0151] This structure preserves the independence of the browser from the processing code, thereby enabling the addition of more processing capabilities to the web server without burdening the user's access device with additional code. Thus, the user need only maintain its browser (a.k.a. "thin client"), 140 FIG. 4, independent of concerns regarding changes and additions to the underlying

financial processing logic.

[0152] Web Server objects update and retrieve from the database; construct and place messages on the Message Bus that are addressed to the Controller, 105 FIG. 4; perform select financial calculations and data manipulation, and retains results of these calculations and data manipulation in persistent object cache; manage and load balance a pool of connections with the database; route alerts to the designated user; enforce access security; and the like. The Web Server also contains application functionality related to the Accounting Information Server, Market Data Information Server, and Customer/Counterparty Information Server. This application functionality helps to distribute the workload as well as "filtering" processing from the generic to the specific. For example, "financial instrument model" objects are used by the Web Server to reduce the data fields presented on the user's screen to only those needed for the specific type of financial instrument that is then being entered, retrieved, or updated (e.g., for a bond or loan, display the interest rate field; but do not show the interest rate field for a stock). Similarly, model objects exist for filtering the fields that are displayed when working with different types of customers (e.g., retail brokerage vs. corporate lending vs. trust vs. capital markets). Model objects can be executed either by the web Server or the appropriate Information Server. The Web server also allows the user to add proprietary application functionality to its application functionality.

Paragraphs [0151]-[0152] disclose a web server, user access device and database but do not teach each of the recited elements of claim 10.

As discussed above, the Office Action fails to set forth a *prima facie* basis to reject claim 10. Charles does not expressly or inherently teach each of the recited claim elements and thus the rejection must be withdrawn. Claims 11-15 are dependent upon claim 10 and are allowable *inter alia* based upon the allowability of claim 10.

*V. The rejection of claim 16 fails to establish that Charles expressly or inherently teaches each of the recited claim elements.*



Claim 16 was also rejected as being anticipated by Charles. The rejection of claim 16 merely recites the claim language and includes a general reference to FIG. 4 and paragraphs 0031-0032, 0099 and 0104 of Charles without any explanation of the pertinence of the cited paragraphs to the claim language. In particular, claim 16 recites a drill-down system used by an application program on a computer readable medium having a drill-down feature activatable to display transaction data from an open business system, comprising: a drill-down interface configured to invoke a generalized interface to a data mart to retrieve detail interface information used to obtain detail information from the open business system. Claim 16 was rejected on that basis that Charles discloses a drill-down system used by an application program on a computer readable medium having a drill-down feature activatable to display transaction data from an open business system, comprising: a drill-down interface configured to invoke a generalized interface to a data mart to retrieve detail interface information used to obtain detail information from the open business system (FIG. 4 and paragraphs 0031-0032, 0099 and 0104). Paragraphs 0031-0032 are quoted above and paragraphs 0099 and 0104 of Charles disclose as follows:

[0099] The business objects have a third dimension that enhances information coherence and comprehension. This is depicted in the schematic diagram of FIG. 10. As presented, data and information in the database have levels of abstraction from the raw incoming transactions to the accounting positions and balances that are derived therefrom, to consolidations of positions and balances by legal entity, customer, counterparty, currency, employee, and the like. This denotes important data groupings across plural accounts. Each trading or customer account will have many positions and cash balances simultaneously maintained for it. For example, accounts all handled by a single trader, or for a single counterparty, are all connected and views of this data become accessible in a consolidated presentation. These interrelationships reflect quick roll-up assessment and drill-down research and from/to derived information to/from detailed data. These interrelationships also reflect a horizontal dimension to the vertical roll-up/drill-down structure such that updates to positions and balances also update summaries by currency, fund, broker, and the like.

[0104] Generating multiple views of the impact of transactions,

integrated with changes to market instruments or customer/counterparty status (e.g., a change in a price, bond rating, or customer/counterparty credit rating; or a corporate action or bankruptcy announcement), support enterprise analytical processing. Examples of critical analytics performed by major financial firms include risk and liquidity analysis, performance measurement, and compliance with in-house and regulatory standards. Roll-up to the enterprise general ledger system is another form of such analytics, with the inventive system performing the role of an integrated sub-ledger and supporting integrated roll-up to and drill-down to/from the general ledger. Because the inventive system standardizes disparate data that originates in disparate systems (as indicated in FIG. 16), and makes both the standardized data and the information that is derived from the incoming data accessible via standard business objects, the development of proprietary analytic applications, and integration with commercially available analytic applications, is greatly streamlined. Block 150, FIG. 4.

A general reference to drill-down research and detailed data does not provide a *prima facie* basis to reject claim 16 above since it does not establish the pertinence of the recited disclosure with respect to each of the recited claim elements. Claims 17-19 are dependent upon claim 16 and are allowable *inter alia* based upon the allowability of claim 16.

Favorable action with respect to claims 1-19 is respectfully requested.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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